

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	Filed Under Seal
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

DECLARATION OF JASON G. SHEASBY IN SUPPORT OF PLAINTIFF
NETLIST, INC.'S MOTION TO COMPEL MICRON TO PRODUCE
CLAWED-BACK DOCUMENTS

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Plaintiff Netlist, Inc.’s Motion to Compel Micron to Produce Clawed-Back Documents. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of email correspondence between Micron counsel Ryuk Park and me, dated December 4, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of an email from Netlist counsel Tom Werner to Micron counsel Ryuk Park, dated December 11, 2023.

4. On December 8, 2023, during the parties’ meet and confer, I asked for Micron to provide a privilege log in connection with the opening report of Dr. Gary Woods that Micron sought to claw back. Micron has not provided such information as of today.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 18, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby
Jason G. Sheasby